

Law Office of Shmuel Klein PA
Attorney for Plaintiffs
113 Cedarhill Ave
Mahwah, NJ 07430
845-425-2510

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

YVONNE ROBINSON, ROSE CIROS, JESSE R. HOWELL
individually and on behalf of all others similarly situated,
Plaintiffs,

vs.

KIA MOTORS AMERICA INC; KIA MOTORS
MANUFACTURING GEORGIA INC., KIA MOTORS
CORPORATION, Kia Motors Co., Ltd.,
SEOUL SOUTH KOREA COMPANY(S),
Hyundai Motor Company, XYZ CORP
Defendants.

Case No.: 13-00006 ES-SCM

X

NOTICE OF PLAINTIFFS' UNOPPOSED MOTION
FOR ATTORNEYS' FEES, EXPENSES AND INCENTIVE AWARDS

PLEASE TAKE NOTICE that at the Final Fairness Hearing scheduled for 6/19/2017 at 11:00 a.m
Plaintiffs will move to have the Court enter the proposed order submitted herewith that will grant their
unopposed motion seeking (1) the payment of \$275,000.00 to Plaintiffs' Counsel for the payment of
their attorneys' fees and reimbursement of expenses, and (2) the payment of incentive awards to named
plaintiffs (\$2,500.00 each to Yvonne Robinson, Rose Ciro, Robert McConnell, Jesse Howell & Cheryl
Moxey; \$1,500.00 each to Phillip Doran and Irene Goodwin, who had both had their claims dismissed
or a total amount of \$15,500.00 incentive total).

PLEASE FURTHER NOTE that Plaintiffs will rely on the Memorandum of Law, Declarations of
Counsel and other related materials in support of this motion.

PLEASE FURTHER NOTE that Defendants do not oppose this motion.

Dated: November 7, 2016

Respectfully submitted,

/s/ Shmuel Klein